



January XX, 2017

The Honorable Robert A. McDonald
Secretary
U.S. Department of Veterans Affairs
810 Vermont Avenue NW
Washington, DC 20420

Director, Regulations Management (02REG)
U.S. Department of Veterans Affairs
810 Vermont Avenue NW
Room 1068
Washington, DC 20420

RE: RIN 2900-AP44- Advanced Practice Registered Nurses (81 Fed. Reg. December 14, 2016)

Dear Secretary McDonald,

On behalf of the XX undersigned national professional nursing organizations representing the Nursing Community coalition, we write to share appreciation and urge continued action for the final rule published by the U.S. Department of Veterans Affairs (VA) on December 14, 2016 (Federal Register Document Number 2016-12338, RIN 2900-AP44)ⁱ regarding Advanced Practice Registered Nurses' (APRNs) clinical practice within the Veterans Health Administration's (VHA). As a coalition, our associations have advocated for APRNs (including Nurse Practitioners (NPs), Certified Registered Nurse Anesthetists (CRNAs), Certified Nurse-Midwives (CNMs), and Clinical Nurse Specialists (CNSs)) in the VHA to practice to the full extent of their education and training since 2013. We applaud the ruling that rightfully grants three of the four roles (NPs, CNMs, and CNSs) full practice, but **urge the department to include CRNAs as part of its full implementation.**

Collectively, the Nursing Community represents over one million registered nurses, APRNs, nursing faculty, students, researchers, and nurse executives. Our associations advocate on a wide variety of issues to advance health and healthcare through the nursing profession. This rule supports our principal mission to promote America's health through nursing care and will directly impact the practice of over 6,000 APRNs who have dedicated their life's work to treating Veterans and their families.

Health care in our country continues to progress toward patient-centered models of care where providers and appropriate coordinated services develop an individualized care plan to meet patients' needs. This rule helps achieve this endeavor by allowing the VHA to manage its resources more prudently and fully employ the skills of healthcare providers to the full extent of their education, training, and certification. Removing additional burdensome requirements of "*clinical supervision from physicians,*"ⁱⁱ (p. 90199) as the rule states, ensures the focus on the

primary mission of VHA which is “provide a complete medical and hospital service for the medical care and treatment of veterans”ⁱ(p.90199). We firmly believe that this goal cannot be achieved if CRNAs are not a part of the final rule.

CRNAs Support Veterans’ Access to Care

The rule details that VHA sites will have the opportunity to expand access to care by removing barriers to APRN practice. We concur that this will be of utmost importance in sites that struggle with provider recruitment and retention in medically-underserved communities. Yet, the rationale the VA cited in the final rule for not including CRNAs was “lack of access issues in the area of anesthesiology”ⁱⁱ (p. 90199). The rule acknowledged that there are “difficulties in hiring and retaining anesthesia providers but generally believes this situation is improving” (p. 90200). We find three grave inconsistencies with this approach.

First, a *Health Affairs* article highlighted the fact that “37,000 certified registered nurse anesthetists provide thirty million anesthetics annually in the United States and represent two-thirds of anesthetists in rural hospitals”ⁱⁱⁱ(p.1469). As the VHA looks to ensure services reach its nation’s Veterans in rural and underserved communities, CRNAs are a critical link to providing that care.

Second, the rationale that the hiring and retention of anesthesia providers is “generally improving” is a shortsighted approach to crafting national policy. Healthcare trends and the needs of our nation’s Veterans are not static. To base a rule on the present, without regard for the future, will only harm the population this rule was intended to support— America’s Veterans.

Finally, the VA’s rulemaking utilized the Federal preemption clause on state nursing licensure which enables standardization of APRN full practice authority. This streamlined approach should be inclusive of all four APRN roles to fully realize the standardization and consistency that the VHA is expecting with the implementation of this final rule. The standardization of full practice authority will allow for more efficient use of APRN staff in the VHA by increasing capacity for timelier, safe, efficient, and effective delivery of care services.

The successful execution of this rule should require that all providers in the VHA—including CRNA’s— are utilized to the full extent of their education and training. Again, we respectfully urge the VHA to implement this rule and include CRNAs. If you have any questions, please contact Convener of the Nursing Community, Dr. Suzanne Miyamoto, at Smiyamoto@aacn.nche.edu.

Sincerely,

Cc:

David J. Shulkin, MD
Under Secretary for Health, VA
Linda M. McConnell, MSN, RN, NEA-BC, FACHE
Chief Nursing Officer
Office of Nursing Services, VA

ⁱFederal Register. (2016, December 14). Advanced practice registered nurses. Retrieved December 15, 2016, from <https://www.federalregister.gov/documents/2016/12/14/2016-29950/advanced-practice-registered-nurses>

ⁱⁱDulisse, B., & Cromwell, J. (2010). No harm found when nurse anesthetists work without supervision by physicians. Health Affairs, 29,1469-1475. Retrieved from: <http://content.healthaffairs.org/content/29/8/1469.full.pdf+html?ijkey=ezh7UYKLtCyLY&keytype=ref&siteid=healthaff>.

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